

1 HONORABLE RICHARD A. JONES
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7 UNITED STATES DISTRICT COURT
 8 WESTERN DISTRICT OF WASHINGTON
 9 AT SEATTLE

10 STEVE TEIXEIRA,

11 Plaintiff,

12 v.
 13 MOZILLA CORPORATION a.k.a. M.F.
 Technologies, a California corporation;
 14 MOZILLA FOUNDATION, a California public
 benefit corporation; LAURA CHAMBERS and
 her marital community; WINIFRED MITCHELL
 BAKER and her marital community, and DANI
 CHEHAK and her marital community.

15 Defendants.

16 Case No. 2:24-cv-1032-RAJ

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**18 DECLARATION OF ALEXANDRIA
 19 CATES IN SUPPORT OF
 20 DEFENDANTS' REPLY IN SUPPORT
 21 OF MOTION TO CONTINUE TRIAL
 22 AND AMEND CASE SCHEDULE**

23 I, Alexandria Cates, declare as follows:

24 1. I am an attorney admitted to practice in the State of Washington, as an associate
 25 with the law firm of DLA Piper LLP (US), and am counsel of record for Defendants Mozilla
 26 Corporation, Laura Chambers, and Dani Chehak (collectively, "Mozilla" or "Defendants") in the
 above-captioned matter. I make this declaration based on personal knowledge and am competent
 to testify to the matters set forth herein.

2. I submit this declaration in support of Defendants' Reply in Support of Motion to
 Continue Trial Date and Related Deadlines.

3. Since the outset of this case, Mozilla has been cooperative with ESI negotiations,
 agreeing to most of Plaintiff's proposed search terms despite their overbroad nature. Mozilla has

been transparent about the time needed to process and collect the extensive data requested by Plaintiff.

4. During a meet-and-confer call on or about January 21, 2025 with Plaintiff's counsel, Plaintiff's counsel demanded data through the date of Plaintiff's termination rather than the date he was placed on leave. This required Mozilla to re-collect data from custodians.

5. Collecting and processing Slack communications proved technically challenging, given the fact that Mozilla upgraded their Slack system during that time. Mozilla’s counsel shared the foregoing technical issues with Plaintiff’s counsel at the initial LCR 26(f) conference. Despite these obstacles, Mozilla has worked diligently to meet its discovery obligations.

6. Attached as **Exhibit A** is a true and correct copy of an email from Plaintiff's counsel dated April 7, 2025, stating that Plaintiff would be unavailable the first week of June 2025 and on June 9, 2025. Additionally, Plaintiff has not completed his document productions in response to outstanding RFPS and produced documents as recently as May 14, 2025.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Seattle, Washington on May 16, 2025.

DLA PIPER LLP (US)

By: s/ Alexandria Cates
Alexandria Cates, WSBA No. 53786

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties or their counsel of record.

Dated this 16th day of May, 2025.

s/ Jacey Bittle
Jacey Bittle, Legal Executive Assistant